

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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SHAWN WOODWARD, 00-A-6563,

Plaintiff,

-VS-

CORRECTIONAL OFFICER MANN, et. al.,

Defendants.

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**Docket No. 09-CV-0451**

**NOTICE OF MOTION FOR SUMMARY JUDGMENT**

MOTION BY:

Defendants DENIS CAMP, STEVEN  
FALLON, MICHAEL HOJSAN,  
TIMOTHY LEWALSKI, M. MANN, and  
QUENTON SCISSUM

RELIEF SOUGHT:

Summary Judgment pursuant to FRCP 56

WHEN RETURNABLE:

As directed by the Court

WHERE RETURNABLE:

Honorable Jeremiah J. McCarthy  
U. S. Courthouse  
2 Niagara Sq.  
Buffalo, NY 14202

SUPPORTING PAPERS:

Memorandum of Law; Statement of  
Undisputed Facts; Declaration of George  
Michael Zimmermann; Declaration of  
Denis Camp, Declaration of Steven Fallon,  
Declaration of Michael Hojsan, Declaration  
of Timothy Lewalski, Declaration of M.  
Mann, Declaration of Quenton Scissum,  
Declaration of Thomas Sticht, Declaration  
of Joyce Krygier, and Declaration of Debra  
Fuller.

Pursuant to Local Rule 7(a)(1), notice is hereby given that defendants intend to file reply papers. Pursuant to Local Rule 7(b) any opposing papers must be served at least fourteen (14) days prior to the return date of the motion unless otherwise ordered by the Court.

DATED: Buffalo, New York  
November 27, 2012

ERIC T. SCHNEIDERMAN  
Attorney General of the State of New York  
Attorney for Defendants  
BY:

/s/ George Michael Zimmermann  
GEORGE MICHAEL ZIMMERMANN  
Assistant Attorney General of Counsel  
Main Place Tower, Suite 300A  
350 Main Street  
Buffalo, NY 14202  
(716) 853-8444  
[George.Zimmermann@ag.ny.gov](mailto:George.Zimmermann@ag.ny.gov)

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2012, I electronically filed the foregoing Notice of Motion, along with the Memorandum of Law; Statement of Undisputed Facts; Declaration of George Michael Zimmermann; Declaration of Denis Camp, Declaration of Steven Fallon, Declaration of Michael Hojsan, Declaration of Timothy Lewalski, Declaration of M. Mann, Declaration of Quenton Scissum, Declaration of Thomas Sticht, Declaration of Joyce Krygier, and Declaration of Debra Fuller with the Clerk of the District Court using its CM/ECF system and thereby provided service on the following CM/ECF participant:

Matthew Parham  
Western New York Law Center, Inc.  
Main Seneca Building  
237 Main Street, Suite 1130  
Buffalo, NY 14203  
716-828-8422  
mparham@wnylc.com

And, I hereby certify that I have mailed the foregoing, by the United States Postal Service, to the following non-CM/ECF participants:

**none**

DATED: Buffalo, New York  
November 27, 2012

/s/ George Michael Zimmermann  
GEORGE MICHAEL ZIMMERMANN  
Assistant Attorney General of Counsel  
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